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*Attorneys for Defendants C. R. Bard, Inc. and
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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

DORIS SINGLETON JONES, an
individual,

Plaintiff,

v.

C.R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, an Arizona corporation,

Defendants.

**PLAINTIFF'S PROPOSED
ADDITIONAL VOIR DIRE
QUESTIONS AND DEFENDANTS'
OBJECTIONS**

(The Honorable David G. Campbell)

1 Plaintiff Doris Jones submits the following proposed additional voir dire questions
2 as directed in the Court's Order dated March 30, 2018 [Doc. 10587].

3 **PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS IN ADDITION TO**
4 **BOOKER VOIR DIRE**

5 1. Is there anyone on the panel who would have a difficult time awarding
6 punitive damages in a personal injury lawsuit regardless of my instructions or the
7 evidence?

8 2. Does anyone on the panel believe that punitive damages should not be
9 allowed in personal injury cases?

10
11 **THE DEFENDANTS' OBJECTIONS:**

12 The Defendants object to these additional questions on the grounds that they imply
13 that Plaintiff is entitled to an award of punitive damages. Defendants further object on the
14 grounds that they are confusing, and as the Court indicated in its ruling on the jury
15 questionnaire the prospect jurors are likely not to understand what is being asked.

16 RESPECTFULLY SUBMITTED this 1st day of May, 2018.

17 GALLAGHER & KENNEDY, P.A.

SNELL & WILMER L.L.P.

18 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Gay Mennuti